



May 7, 2018

VIA Electronic Submission to glenn.meeks@waterboards.ca.gov

Pamela Creedon, Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite #200
Rancho Cordova, CA 95670

Re: Comments on Proposed Amendments to the Water Quality Control Plans for the Sacramento and San Joaquin River Basins and Tulare Lake Basin to Incorporate a Central Valley-wide Salt and Nitrate Control Program

Ms. Creedon, Mr. Meeks and Members of the Central Valley Regional Water Quality Control Board:

The Wonderful Company LLC ("Wonderful") appreciates the opportunity to provide comments to the Central Valley Regional Water Quality Control Board (Water Boards) regarding the proposed amendments to the Water Quality Control Plans for the Sacramento and San Joaquin River Basins and Tulare Lake Basin to Incorporate a Central Valley-wide Salt and Nitrate Control Program ("CV SALTS Program"). Wonderful appreciates the efforts of the Water Boards over the years to develop the CV Salts Program; this effort is critical to protect water quality without imposing unnecessary burdens on regulated industry.

Wonderful and its related entities farm and process almonds, pistachios, citrus, pomegranates, nursery stock, and wine grapes throughout California. Every year we grow, harvest, package and ship healthy products to our customers on a global scale. We aspire to provide our customers with consistently superior quality, food safety and service by holding ourselves to standards far beyond our direct competition. We strive for environmental sustainability in our processes, technologies and packages by conserving energy, water and other resources.

Wonderful commends the Water Boards and staff for their commitment to this process and for working with industry and other stakeholders to develop a program that is protective of water quality and appropriately considers on-the-ground conditions in the Central Valley. We request that the following comments be considered when finalizing the incorporation of the CV Salts Program into the Basin Plans:

- 1) "Implementation of Reasonable, Feasible and Practicable Efforts to Control Salt," should be determined on a case-by-case basis. Doing so will provide more tailored management approaches for regulated entities, which will increase effectiveness of compliance measures and allows the Water Board's expectations of reasonable, feasible and practicable to advance concurrently with technologies and economies of scale.

- 2) Please define the term “zone of contribution” and clarify whether zone of contribution and area of contribution are the same for purposes of the CV Salts Program. If they are different, please define “area of contribution” as well.
- 3) The Tulare Lake Basin Plan boron limit of 1 mg/L is not a water quality objective, and is not directly tied to protecting any specific beneficial use. Thus, retaining this limit of 1 mg/L lacks justification and purpose. To address this issue, Wonderful recommends that the limit of 1 mg/L be deleted throughout chapter 4 of the Tulare Lake Basin Plan. In its place, Wonderful recommends that reference be made to the applicable water quality objective for boron. This will provide the Central Valley Water Board with the discretion to properly interpret the applicable the actual agricultural use without unduly limiting boron to 1 mg/L with no proper justification.
- 4) Please clarify whether an entire management zone is considered a zone of contribution.
- 5) Surveillance and monitoring requirements should not be duplicative of requirements in other programs, namely the Irrigated Lands Regulatory Program (ILRP) and/or the Sustainable Groundwater Management Act (SGMA). The CV Salts Program requirements should complement rather than duplicate the requirements of other programs.

Thank you for your hard work on this program. Wonderful looks forward to working with the Water Boards on implementation of the CV Salts Program and would be happy to discuss these comments at your convenience.

Sincerely,



Melissa Poole
Senior Counsel/Director of Government Affairs